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U.S. DISTRICT COURT
SEAL
NEBRASKA
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DOUGLAS ALLEN VOYLES, SR.,

Defendant.

8:25CR96

INDICTMENT

18 U.S.C. § 554

18 U.S.C. §§ 922(e) & 924(a)(1)(D)

13 U.S.C. § 305

The Grand Jury charges that

COUNT I

On or about April 20, 2023, in the District of Nebraska and elsewhere, the defendant, DOUGLAS ALLEN VOYLES, SR., did fraudulently and knowingly export and send, and attempt to export and send, one fully assembled upper receiver, handguard and barrel with a “5.56 NATO 1:7” inscription from the United States, contrary to 50 U.S.C. § 4801 et seq., 15 C.F.R. Part 730 et seq., and 13 U.S.C. 305, laws and regulations of the United States.

In violation of Title 18, United States Code, Section 554.

COUNT II

On or about April 15, 2023, in the District of Nebraska and elsewhere, the defendant, DOUGLAS ALLEN VOYLES, SR., did fraudulently and knowingly export and send, and attempt to export and send, the below-listed items from the United States, contrary to 50 U.S.C. § 4801 et seq., 15 C.F.R. Part 730 et seq., and 13 U.S.C. 305, which are laws and regulations of the United States:

- a. Four silver AR 15 Lower Receiver blanks
- b. One black AR 15 Lower Receiver blank with a white envelope labeled ARSS 80% Lower Black and an invoice
- c. One purple AR 15 Lower Receiver blank
- d. One black AR 15 Lower Receiver blank

- e. One tan AR 15 Lower Receiver blank
- f. One blue AR 15 Lower Receiver blank

In violation of Title 18, United States Code, Section 554.

COUNT III

On or about September 3, 2022, in the District of Nebraska and elsewhere, the defendant, DOUGLAS ALLEN VOYLES, SR., did fraudulently and knowingly export and send, and attempt to export and send, ten Lone Wolf – Freedom wolf – 80% Pistol Frame Kits from the United States, contrary to 18 U.S.C. § 922(e), 13 U.S.C. 305, 50 U.S.C. § 4801 et seq. and 15 C.F.R. Part 730 et seq., which are laws and regulations of the United States.

In violation of Title 18, United States Code, Section 554.

COUNT IV

On or about September 3, 2022, in the District of Nebraska and elsewhere, the defendant, DOUGLAS ALLEN VOYLES, SR., did knowingly deliver and cause to be delivered to a common and contract carrier for transportation and shipment in foreign commerce, to persons other than a licensed importer, manufacturer, dealer and collector, a package containing firearms, and did so without giving written notice to the carrier that such firearms were being transported and shipped in that, DOUGLAS ALLEN VOYLES, SR., listed the contents of the package as “Motorcycle Parts,” while knowing the package contained firearms.

All in violation of Title 18, United States Code, Sections 922(e) and 924(a)(1)(D).

COUNT V

On or about September 3, 2022, in the District of Nebraska and elsewhere, the defendant, DOUGLAS ALLEN VOYLES, SR., did submit and knowingly cause to be submitted false and misleading export information through a Shipper’s Export Declaration and the Automated Export System, by falsely declaring the contents of the shipment to only be “Motorcycle Parts,”


when, in fact, DOUGLAS ALLEN VOYLES, SR. knew the shipment at issue contained firearms.

All in violation of Title 13, United States Code, Section 305.

A TRUE BILL.

FOREPERSON 

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.


SEAN P. LYNCH #25275
Assistant U.S. Attorney